

EXHIBIT ONE

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

JAQUETTA ANN COOPWOOD,

Plaintiff,

-vs-

COUNTY OF WAYNE,
SGT. WATT,

Case No. 2:20-cv-12092-AJT-DRG

Hon. Arthur J. Tarnow

Defendants.

AFFIDAVIT

I, JAQUETTA COOPWOOD, affirms the following, subject to the penalties for perjury:

1. I am the individual Plaintiff in the above-entitled action, and I am familiar with all of the facts and circumstances in this action.
2. I have personal knowledge of the matters set forth below, and the exhibits annexed hereto are true copies of the original documents.
3. On or about August 4, 2020, a Complaint was filed with the Court in the above-entitled matter. A true copy of this complaint is annexed hereto as **Exhibit A**. I have read the attached complaint and know the contents thereof. The allegations alleged as to Defendant Sgt. Watt are true to my own knowledge except as to matters therein stated to be alleged upon information and belief, and as to those matters, I believe them to be true.
4. In 2008, I was first diagnosed with depression through the University of Michigan Psychiatric Facility, while I attended the university as a student. At that time, I was experiencing a lack of sleep for more than 3 consecutive days. The doctor prescribed me Celexa.
5. Later in 2008, I went to Providence Hospital in Southfield, Michigan for the same issues of lack of sleep for more than 5 consecutive days and severe depression, and an episode of psychosis.

6. Ultimately, I was diagnosed with having bi-polar disorder. The doctor prescribed me with Risperidone, Antivan, and Seroquel, which helped to keep me stable.

7. In 2010, I was admitted to Henry Ford Psychiatric Facility in Detroit, Michigan for bi-polar disorder. I had experienced lapses in time where I could not remember what happened and I also felt a sensation as if things were crawling on me. I was then prescribed with Zyprexa and Haldol.

8. In 2012 and 2015, I went back to Providence Hospital for lack of sleep and depression. On this occasion, I was prescribed Trazadone and sent to an outpatient program called Detroit Development Center. There, I was receiving a monthly therapy session and they monitored my medication intake so that in the instance it failed, and my mental illness symptoms regressed, they could seek a better treatment plan.

9. In 2016, I went to Providence Hospital and received a psychiatric evaluation to determine whether I had a new mental health illness. As it turned out, I did, and my condition changed from Bi-Polar to Bi-Polar Schizophrenia. I remained in Providence Hospital for over 30 days. While at Providence, I remained on the same medication regimen and received in-patient treatment.

10. In 2017, I was admitted to Harbor Oak for 10-days for lack of sleep.

11. When I was at Wayne County Jail, I was housed in the Psychiatric Unit on the 5th floor. I was put there because of my mental and psychiatric conditions.

12. Prior to going to Wayne County, I was taken off of my psychiatric medications because of my pregnancy. When I was taken to jail, I had already been off of my medications for 3-days.

13. Being taken off of these medications greatly affected my mental health and overall well-being. I was unable to sleep, had difficulty eating, and as such, my anxiety greatly worsened,

and I had a great difficulty understanding events and my reading comprehension may become affected.

14. When I am taken off my psychiatric medications, my mental illness impairs my judgment and ability to understand or process information.

15. I do not remember receiving any forms in general, and certainly do not recall receiving any forms related to time constraints or other requirements relative to filing an internal grievance with the jail.

16. However, I do recall Sgt. Watt physically assaulting me and kicking me and dragging me back to my cell.

17. After Sgt. Watt assaulted me, I asked to speak to someone about the altercation, and my desperate need for medical attention. I asked to speak to whoever was in charge, and they wouldn't let me.

18. Eventually, after additional complaints, I did fill out some type of paper, which I believe they told me was a grievance form. I do not remember the name of the officer or guard who took my complaint, but it was to a Sgt. on the 5th floor with the Psychiatric Unit.

19. I do not believe anything came of my grievance at the jail, but as a result of my complaints I was taken to the hospital (DMC) for medical treatment.

20. Annexed hereto as **Exhibit B** is a true copy of my judgment of sentence.

21. Annexed hereto as **Exhibit C** is a true copy of my presentence report.

22. Annexed hereto as **Exhibit D** is a true copy of an opinion issued by the Michigan Court of Appeals.

Further affiant sayeth not.

Dated: Ypsilanti, Michigan
April 27, 2021

Renata Fracz
NOTARY PUBLIC

RENATA FRACZ
NOTARY PUBLIC, STATE OF MI
COUNTY OF OAKLAND
MY COMMISSION EXPIRES May 29, 2027
ACTING IN COUNTY OF Washtenaw

Jaquetta Coopwood
JAQUETTA COOPWOOD

